

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2019-130-E / 2019-51-E / 2018-401-E

IN RE:)	
)	
Ecoplexus Inc.)	
)	
Complainant,)	SECOND CONSENT MOTION TO EXTEND DEADLINES
)	
v.)	
)	
Dominion Energy South Carolina, Inc. (f/k/a South Carolina Electric & Gas Company,)	
)	
Defendant.)	

Pursuant to Commission Rule 103-829 and -831, Ecoplexus Inc. (“Ecoplexus”) and Dominion Energy South Carolina (f/k/a South Carolina Electric & Gas Company)(“DESC”) hereby submit this Second Consent Motion to Extend Deadlines to postpone all dates in the schedule issued in this matter by the Standing Hearing Officer Directive dated April 9, 2020 and all discovery in this matter for forty-five (45) days as a result of the disruption to business and legal matters due to COVID-19 and to allow the parties to continue settlement discussions.

The original schedule in this matter was set by the Standing Hearing Officer Directive dated March 9, 2020. On Consent Motion to Extend Deadlines of the parties dated April 9, 2020, the Commission extended that schedule by 45 days in the Standing Hearing Officer Directive dated April 9, 2020, which provided the following deadlines:

May 22, 2020	Discovery to resume
June 4, 2020	Ecoplexus’ Responses to DESC’s First Set of Discovery Requests

June 24, 2020	Oral arguments regarding Motion to Dismiss
July 2, 2020	Discovery process ends
July 16, 2020	Ecoplexus prefile direct testimony
July 30, 2020	Other parties' testimony
August 6, 2020	Ecoplexus rebuttal testimony
August 13, 2020	Other parties' surrebuttal testimony
August 31, 2020	Hearing to be rescheduled by the Commission not before this date

The parties have been engaged in meaningful settlement discussions and would like additional time to continue those settlement discussions. Additionally, the parties are continuing to work remotely with limited staff and resources due to the COVID-19 pandemic. As a result, both parties are substantially hindered in conducting or responding to discovery and in adequately preparing for all other matters currently scheduled by the Standing Hearing Officer Directive. Accordingly, the parties request an additional forty-five (45) day extension for all dates in the Standing Hearing Officer Directive and a hold on all discovery, including responses currently due, for the same forty-five (45) days. The parties believe that the requested 45-day extension is reasonable under the current circumstances. Both parties agree not to serve or otherwise conduct any discovery in this matter until the 45-day period has ended on July 6, 2020.

The proposed revised schedule would be as follows:

July 6, 2020	Discovery to resume
July 20, 2020	Ecoplexus' Responses to DESC's First Set of Discovery Requests
August 10, 2020	Oral arguments regarding Motion to Dismiss
August 17, 2020	Discovery process ends
August 31, 2020	Ecoplexus prefile direct testimony

September 14, 2020 Other parties' testimony

September 21, 2020 Ecoplexus rebuttal testimony

September 28, 2020 Other parties' surrebuttal testimony

October 15, 2020 Hearing to be rescheduled by the Commission not before this date

For the aforementioned reasons, Ecoplexus and DESC respectfully request that the Commission grant this Motion in its entirety.

WE SO CONSENT:

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May 22, 2020

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THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-130-E / 2019-51-E / 2018-401-E

IN RE:)	
)	
Ecoplexus Inc.)	
)	Certificate of Service
Complainant)	
)	
vs.)	
)	
South Carolina Electric & Gas)	
)	
Defendant)	
)	

This is to certify that I, Jeremy C. Hodges, have this date served one copy of a Second Consent Motion to Extend Scheduling Deadlines in the above referenced matters to the person(s) named below by electronic mail, as shown below:

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s/

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Dated: May 22, 2020.